

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**MARY LALIBERTE, *et al.*,**

**Plaintiffs,**

**v.**

**QUANTA SERVICES, INC., *et al.*,**

**Defendants.**

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**Case No: 4:22-cv-03290**

**JOINT MOTION FOR ENTRY OF CLASS CERTIFICATION BRIEFING SCHEDULE**

Plaintiffs, Mary Laliberte and Marie McKnight (together, “Plaintiffs”), individually and on behalf of the Quanta Services, Inc. 401(k) Savings Plan (“Plan”) and a proposed class of participants and beneficiaries in the Plan, and Defendants Quanta Services, Inc., the Board of Trustees of Quanta Services, Inc., and the Quanta Services, Inc. 401(k) Savings Plan Committee (collectively, “Defendants” and, together with Plaintiffs the “Parties”), by and through their respective counsel, respectfully request the entry of the [Proposed] Class Certification Briefing Schedule filed simultaneously with this Joint Motion. As grounds for this Motion, the Parties state as follows:

1. Plaintiffs filed their Motion for Class Certification on September 20, 2024. Dkt. 71.
2. The initial Scheduling Order entered in this case set a “Motions Deadline” of September 20, 2024. Dkt. 44.
3. The Parties filed a Joint Motion for Entry of an Amended Scheduling order on March 19, 2024 (Dkt. 67), which the Court granted and entered the Amended Scheduling Order on April 3, 2024. Dkt. 68.

4. The Amended Scheduling Order specifies a briefing schedule for dispositive and *Daubert* motions, but does not specify a deadline for moving for class certification or establish a briefing schedule for class certification. Dkt. 68.

5. Pursuant to the Local Rules, Defendants' Opposition to Plaintiffs' Motion for Class Certification is due on October 11, 2024, and Plaintiffs' Reply thereto is due on October 18, 2024. L.R. 7.4.

6. Discovery in this case closes on November 1, 2024 (Dkt. 68), and the Parties are in the midst of preparing to take several expert depositions throughout the month of October.

7. The Parties have conferred and are in agreement that each would benefit from additional time to complete class certification briefing, in light of the impending discovery deadline and other professional obligations over the next month. As such, the Parties propose the following briefing schedule:

a. November 1, 2024: Defendants' Opposition.

b. November 22, 2024: Plaintiffs' Reply.

8. No Party will be prejudiced by the grant of this briefing schedule.

9. Granting this briefing schedule will not result in the delay of any other currently existing case deadlines.

10. The Parties respectfully submit that good cause exists for the modification of the class certification briefing schedule and this request is not made for purposes of delay or any improper purpose.

For the foregoing reasons, the Parties jointly request that this Court enter the [Proposed] Class Certification Briefing Schedule.

Dated: October 1, 2024

Respectfully submitted,

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**CERTIFICATE OF CONFERENCE**

I hereby certify that I have conferred with Plaintiffs' counsel, and they advised me that the motion is unopposed.

/s/ Jeremy P. Blumenfeld  
Jeremy P. Blumenfeld

**CERTIFICATE OF SERVICE**

The undersigned counsel certifies that a true and correct copy of the foregoing document was served via the Court's ECF/CM e-filing system to all counsel of record on September 30, 2024.

/s/ Jeremy P. Blumenfeld  
Jeremy P. Blumenfeld